

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

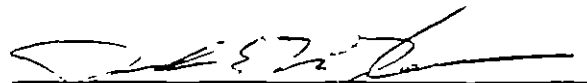
DOCKET NO. R97-1

**FIRST SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS O'HARA
(UPS/USPS-T30-1 through 2)**

(July 24, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness O'Hara (UPS/USPS-T30-1 through 2).

Respectfully submitted,



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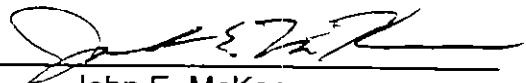
**INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS O'HARA**

UPS/USPS-30-1. If the Postal Service had included the same contingency factor in its test year estimates of accrued costs in this proceeding as the Commission used in Docket No. R94-1, what Parcel Post cost coverage would result from the rates proposed in this proceeding?

UPS/USPS-T30-2. Assume that the Commission were to approve the proposed rates, resulting in a test year Parcel Post cost coverage that the Postal Service estimates to be 103%. What would be the total dollar contribution that Parcel Post would make to the restoration of the Postal Service's equity in the test year?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.



John E. McKeever

Dated: July 24, 1997
Philadelphia, Pa.